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August 28, 2019

BY ECF

Honorable Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Maya Zabar v. New York City Department of Education, et al.
Docket No. 18-CV-06657 (PGG)

Dear Judge Gardephe:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for the defendant Board of Education of the City School District of the City of New York ("BOE") (also known as and sued herein as the "New York City Department of Education") and the individually named defendants Marisol Rosales, Manuel Ureña, Lynn Rosales, and Sari Perez in the above-referenced action. I write to request that Your Honor extend the time for the parties to submit post-discovery pre-motion letters from September 3, 2019 to September 17, 2019, which is a 2-week extension. Plaintiff's counsel has consented to my request. The parties are currently engaging in settlement discussions and would like more time to discuss the potential settlement of this case before submitting pre-motion letters for summary judgment to Your Honor.

This is the first such request of this Court for additional time for post-discovery pre-motion letters. There are two other dates that would be affected by this request. The first is a post-discovery dispositive pre-motion opposition letter, which the parties request is moved from September 9, 2019 to October 1, 2019, which is a 2-week extension. The second affected date is the pre-trial conference scheduled for September 23, 2019. In the event that the parties are unable to reach a settlement agreement, the parties request that the pre-trial conference is adjourned *sine die* until the dispositive motion for summary judgment is decided.

Respectfully submitted,

/s/ Samantha P. Turetsky

Samantha P. Turetsky

Assistant Corporation Counsel

cc: Bryan D. Glass Esq. (via ECF)
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